## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

NORTHERN NEW JERSEY ORTHOPAEDIC SPECIALISTS, P.A.; MARC A. COHEN, M.D.; BERGEN ANESTHESIA & PAIN MANAGEMENT; MICHAEL D. MOST, M.D. a/s/o E.C.,

Plaintiffs,

CIVIL ACTION NO

CIVIL ACTION NO.: 12-06257-SRC-CLW

v.

HEALTH NET OF NEW JERSEY, INC.; ABC CORP. 1-10 (said names being fictitious and unknown entities),

Defendant(s).

## NOTICE OF MOTION

To: Andrew Bronsnick, Esquire
MASSOOD & BRONSNICK
50 Packanack Lake Road East
Wayne, NJ 07470
Attorneys for Plaintiffs

PLEASE TAKE NOTICE that on September 16, 2013, at 9:00 a.m., or as soon thereafter as counsel can be heard, the undersigned counsel for Defendant Health Net of New Jersey ("Health Net") shall move before the United States District Court District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey for an Order granting Summary Judgment in its favor and against Plaintiffs Northern New Jersey Orthopaedic Specialists, Marc A. Cohen, M.D., Bergen Anesthesia & Pain Management and Michael D. Most, M.D.

PLEASE TAKE FURTHER NOTICE that Health Net shall rely upon the enclosed Memorandum of Law, Certifications and Exhibits in support of this Motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is attached hereto.

**CONNELL FOLEY LLP** 

Liberty View 457 Haddonfield Rd., Ste. 230 Cherry Hill, New Jersey 08002 (856) 317-7100 Attorneys for Defendant Health Net of New Jersey

BY: /s/Matthew A. Baker

Matthew A. Baker, Esquire

DATE: August 23, 2013